

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	MM Docket No. 99-25
)	
Creation of a Low Power)	RM-9208
Radio Service)	RM-9242
)	
TO: The Full Commission		

COMMENTS OF JAMES W. LAWSON AND LARRY LANGFORD, JR.

James W. Lawson (“Lawson”) and Larry Langford, Jr. (“Langford”), by their attorney, hereby respectfully submit the following Comments in this proceeding:

1. Lawson and Langford are both African-Americans. Mr. Langford owns an AM broadcast station in Cassopolis, Michigan. Mr. Lawson owns an AM broadcast station in Tuscaloosa, Alabama. Messrs. Lawson and Langford have both worked very hard for many years to build up their AM broadcast stations. This is a daunting task, because African-Americans were among the very first groups to desert AM in favor of FM, and it is very difficult to attract them back to the AM band.

2. Messrs. Lawson and Langford are not alone. FM broadcast stations have become so expensive that relatively few African-Americans can own these stations. Therefore, to serve the needs of the minority community, many African-Americans have acquired AM broadcast stations. In fact, a disproportionate number of AM broadcast stations are owned by African-Americans.

3. The Commission’s proposal to establish two categories of LPFM stations and

to exclude existing broadcasters from ownership of these stations will not benefit Messrs. Lawson or Langford, nor will it benefit other African-Americans who have worked long and hard to acquire and build up AM broadcast stations. To the contrary, the establishment of large numbers of LPFM stations, which cannot be owned by these hard working, existing, AM broadcasters threatens to so fractionalize the audience and advertiser base as to actually destroy the viability of stations, such as those owned by the commentators.

4. If the Commission is determined to go forward with this proposal, existing AM broadcasters who own only one station in a community should be eligible to apply for LPFM's. Indeed, a preference and/or a substantial bidding credit ought to be given to those such as Lawson and Langford who have labored long and hard to acquire AM broadcast facilities and to make those facilities viable. These AM broadcasters already face severe competition from large companies who may own several broadcast stations in the market. These single station AM broadcasters need help. It seems unfair for the Commission to hand out FM licenses willy-nilly without any regard for the impact of these actions on existing AM licensees and, in particular, minority-owned licensees.

Respectfully submitted,

JAMES W. LAWSON
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